

**MIRIAM TAUBER LAW**

885 Park Ave. # 2A • New York NY 10075  
MiriamTauberLaw@gmail.com • (323) 790-4881

June 20, 2022

**Via ECF**

Hon. Robert W. Lehrburger (U.S.M.J., S.D.N.Y.)

***Avalon Holdings Corp. v. Gentile et. al., No. 18-cv-7291-VSB (S.D.N.Y.);  
& New Concept Energy, Inc. v. Gentile, et. al., No. 18-cv-8896 (S.D.N.Y.)***

**Letter Motion re: Deadline for Plaintiffs' Reply Brief in Support of Motion for Entry of Judgment**

Your Honor:

As the Court will recall, a conference was held on June 6, 2022, regarding Plaintiffs' pending Motion for Judgment [New Concept Dkt #89; Avalon Dkt #100] and Defendants' discovery letter motion [New Concept Dkt #92; Avalon Dkt #103].

At the conference, the Court extended Plaintiffs' deadline to file a Reply Brief in support of the Motion for Judgment until today, Monday, June 20, 2022. As today is a federal holiday (Juneteenth), Plaintiffs' actual deadline is tomorrow, Tuesday, June 21, 2022.

Plaintiffs note that an order was not entered following the June 6 conference on either the Avalon or New Concept case dockets. Accordingly, Plaintiffs write this letter to clarify the applicable deadline.

Additionally, with Defendants' consent, Plaintiffs request a brief extension of the deadline (whether today or tomorrow). Plaintiffs propose to file their Reply on Wednesday, June 22, 2022.

No other deadlines will be impacted by this Request.

Respectfully submitted,

*s/ Miriam Tauber*

---

Miriam Tauber  
*Attorney for Plaintiffs*